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14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 Case No. 2:17-CV-02089-RFB-GWF

17 RONALD R. JARAGOSKY, a single man,  
18 Plaintiff,  
19 vs.

20 FORD MOTOR COMPANY, a Delaware  
21 corporation; and JOHN DOE ENTITIES I-X,  
22 inclusive,  
23 Defendants.

24 **STIPULATION AND ORDER**  
25 **TO EXTEND DISCOVERY**  
26 **(First Request)**

27 Pursuant to FRCP 6 and FRCP 26, the parties, through their respective counsel, hereby  
28 stipulate and agree to jointly move this court for an Order to:

1. Extend the deadline to amend pleadings and add parties from 02/15/18 to 04/02/18;
2. Extend the deadline to file the interim status report from 02/15/18 to 04/02/18;
3. Extend the deadline for Plaintiff to disclose initial experts from 02/15/18 to 04/02/18;

- 1 4. Extend the deadline for Defendant to disclose initial experts from 04/16/18 to  
2 05/31/18;
- 3 5. Extend the deadline to disclose rebuttal experts from 05/16/18 to 07/02/18;
- 4 6. Extend the discovery cut-off from 08/14/18 to 09/28/18;
- 5 7. Extend the deadline to file dispositive motions from 09/13/18 to 10/29/18;
- 6 8. Extend the deadline to file the joint pretrial order from 10/05/18 to 11/19/18. In the  
7 event dispositive motions are filed, the date for filing the joint pretrial order shall be  
8 suspended until 30 days after a decision of the dispositive motions.  
9

10 **I.**

11 **DISCOVERY COMPLETED**

- 12 • October 10, 2017 Plaintiff's Initial Disclosure Statement
- 13 • November 10, 2017 Ford Motor Company's Initial Disclosure Statement
- 14 • January 12, 2018 Plaintiff's First Set of Non-Uniform Interrogatories to  
15 Defendant Ford Motor Company
- 16 • January 12, 2018 Plaintiff's First Set of Requests to Produce to Defendant  
17 Ford Motor Company
- 18 • January 26, 2018 Ford Motor Company's First Request for Production of  
19 Documents to Ronald R. Jaragosky
- 20 • January 26, 2018 Ford Motor Company's First Set of Non-Uniform  
21 Interrogatories to Ronald R. Jaragosky
- 22 • January 31, 2108 Submission of Protective Order  
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1 Jiworsky, Donald Patrick, NHP Officer Truscello, and Kevin Clickner, in  
2 California and Nevada March 12-March 16.

- 3 2. Defendant will likely be deposing Plaintiff's experts on both liability and  
4 damages.  
5  
6 3. Defendant intends to perform inspections of the subject vehicle on  
7 February 26, 2018, February 28, 2018 and April 1, 2018.  
8  
9 4. Defendant may propound additional written discovery as needed.

10 **IV.**

11 **PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

12 The parties have agreed to extend all the discovery deadlines in this case by 45 days as  
13 set forth below:

- 14 1. Extend the deadline to amend pleadings and add parties from 02/15/18 to  
15 04/02/18;  
16  
17 2. Extend the deadline to file the interim status report from 02/15/18 to 04/02/18;  
18  
19 3. Extend the deadline for Plaintiff to disclose initial experts from 02/15/18 to  
20 04/02/18;  
21  
22 4. Extend the deadline for Defendant to disclose initial experts from 04/16/18 to  
23 05/31/18;  
24  
25 5. Extend the deadline to disclose rebuttal experts from 05/16/18 to 07/02/18;  
26  
27 6. Extend the discovery cut off from 08/14/18 to 09/28/18;  
28  
29 7. Extend the deadline to file dispositive motions from 09/13/18 to 10/29/18;  
30  
31 8. Extend the deadline to file the joint pretrial order from 10/05/18 to 11/19/18.

In the event dispositive motions are filed, the date for filing the joint pretrial

order shall be suspended until 30 days after a decision of the dispositive motions.

DATED this 2<sup>nd</sup> day of February, 2018.

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*Ronald Jaragosky v. Ford Motor Company*  
Case No. 2:17-CV-02089-RFB-GWF

**ORDER**

**IT IS SO ORDERED** this 5th day of February, 2018.

  
UNITED STATES MAGISTRATE JUDGE

1 Prepared and Submitted by:  
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